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19 *Counsel for Ad Hoc Group of Subrogation Claim Holders*

20 **UNITED STATES BANKRUPTCY COURT**

21 **NORTHERN DISTRICT OF CALIFORNIA**

22 **SAN FRANCISCO DIVISION**

23 **In re:**

24 **PG&E CORPORATION,**

25 **-and-**

26 **PACIFIC GAS AND ELECTRIC
COMPANY,**

27 **Debtors.**

28 Case No. 19-30088 DM
Chapter 11

(Lead Case)
(Jointly Administered)

29 **NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE**

30 Affects PG&E Corporation
31 Affects Pacific Gas and Electric Company
32 Affects both Debtors

33 ** All papers shall be filed in the lead case,
34 No. 19-30088 DM*

1 **PLEASE TAKE NOTICE** that Willkie Farr & Gallagher LLP and Diemer & Wei,
2 LLP hereby enter their appearance (the “Notice of Appearance”) in the above-captioned cases as
3 counsel to the Ad Hoc Group of Subrogation Claim Holders pursuant to section 1109(b) of title 11
4 of the United States Code, 11 U.S.C §§ 101-1532 (as amended, the “Bankruptcy Code”), and rules
5 2002, 3017(a), 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (as amended, the
6 “Bankruptcy Rules”), and request that copies of any and all notices and papers filed or entered in
7 these cases be given to and served upon the following:

8
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28 **PLEASE TAKE FURTHER NOTICE** that this notice of appearance and any subsequent
appearance, pleading, claim, or suit is not intended nor shall be deemed to waive the rights of the Ad
Hoc Group of Subrogation Claim Holders (1) to have an Article III judge adjudicate in the first
instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter
a final order or judgment consistent with Article III of the United States Constitution, (2) to have
final orders in a non-core case, proceeding, matter, or controversy entered only after an opportunity
to object to proposed findings of fact and conclusions of law and a de novo review by a district court
judge, (3) to trial by jury in any case, proceeding, matter, or controversy so triable, (4) to have the
reference withdrawn by the United States District Court in any case, proceeding, matter, or
controversy subject to mandatory or discretionary withdrawal, or (5) any other rights, claims, actions,
defenses, setoffs, or recoupments to which the Ad Hoc Group of Subrogation Claim Holders is or

1 may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses,
2 setoffs, and recoupments expressly are hereby reserved.

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5 Dated: March 12, 2019

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/S/ Kathryn S. Diemer

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/S/ Matthew A. Feldman

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